No. 34512-2-III

COURT OF APPEALS, DIVISION III
OF THE STATE OF WASHINGTON

THE STATE OF WASHINGTON,

Respondent

v.

FRANCISCO J. MUNOZ QUINTERO,

Appellant

ON APPEAL FROM THE SUPERIOR COURT OF THE
STATE OF WASHINGTON FOR BENTON COUNTY

NO. 15-1-01427-1

BRIEF OF RESPONDENT

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A. Given the facts and circumstances of this case, the sentencing court properly ordered a lifetime no-contact order between the defendant, Francisco J. Munoz Quintero, and his daughter, A.M.

II. STATEMENT OF FACTS

On Christmas Eve 2015, the defendant, Francisco J. Munoz Quintero, shot and killed his ex-girlfriend, Luisa Garcia, in front of their almost two-year-old daughter, A.M. CP 1; RP 06/20/2016 at 63, 76.

Earlier that day, Luisa dropped A.M. off with the defendant and his uncle, Jaime Lopez, in Sunnyside, to allow A.M. to spend the day with her father. McLaughlin[1] RP 05/18/2016 at 70. She then went to Walmart, where she worked as an asset protection associate. RP[2] at 522, 526-27. While Luisa was at work, the defendant and A.M. went to Mabton to see his Aunt and Uncle Quintero Medina. McLaughlin RP 05/18/2016 at 73-74. After Luisa's shift at Walmart ended around 9:00 p.m., she drove out to Mabton to pick up A.M. McLaughlin RP 05/18/2016 at 75, 79. The defendant asked Luisa to drive him to Kennewick so he could stay with a friend, Fernando Cuellar. RP at 836.

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[1] Court reporter John McLaughlin transcribed the trial proceedings on the afternoon of 05/18/2016. Citations to his portion will be so labeled.

[2] Unless otherwise indicated, "RP" refers to the verbatim report of proceedings from jury trial transcribed by court reporter Cheryl Pelletier, volumes III through VI.

At approximately 11 p.m., America de la Mora and her neighbor Vanessa Chapa, were taking out the trash near 619 North Tweedt Street in Kennewick. RP at 546-47; McLaughlin RP 05/18/2016 at 33. America testified she heard a car drive up very fast, and then when she looked back, she saw there was a girl lying in the middle of the street. RP at 547-48. Vanessa testified that she saw a girl fall out of a white car before it sped away. McLaughlin RP 05/18/2016 at 34. As cars began to back up in the street, America and Vanessa ran out into the street, and the two carried the girl to the sidewalk. RP at 548-49; McLaughlin RP 05/18/2016 at 35.

Vanessa screamed for someone to call the cops because the girl was gasping for air and "gurgling." RP at 549; McLaughlin RP 05/18/2016 at 36. At 11:19 p.m., paramedic Daniel Tate arrived at the scene, initially to what he believed was a choking female. RP at 591. His team began lifesaving procedures and discovered a gunshot wound to the female's right side. RP at 595-97.

The paramedics quickly transported her to the Trios Medical Center, arriving at 11:44 p.m. RP at 586, 598-99. Upon arriving at Trios, the emergency doctors worked on the female victim, but eventually pronounced her dead. RP at 618. Officer Rebecca Jones from the Kennewick Police Department was dispatched to Trios to try to identify the victim and collect any evidence. RP at 617-19. Officer Jones collected

the girl's clothing: a black tank top, plaid over-shirt, boots, socks, and undergarments. RP at 618-19. The over-shirt appeared to have a hole singed or burnt on the outside. RP at 628.

Given the nature of the crime, Detective Todd was dispatched to Tweedt Street to process the scene. RP at 866-67. Detective Todd took photographs of the scene and collected a bag and jacket as evidence. RP at 869-70. The jacket had two holes on the right side that went through to the inside. RP at 870-72.

At approximately 12:29 a.m. on December 25, 2015, Paula Garcia, Luisa Garcia's older sister, received a phone call from Adriana Munoz-Quintero, the defendant's sister. RP at 462, 472, 475. Adriana was crying and informed Paula that the defendant just told her he shot Luisa. RP at 475-76. Officer Park responded to 311 North 8th Avenue in Pasco to speak with Paula regarding this information and also spoke with Adriana on the phone. McLaughlin RP 05/18/2016 at 28-30. At this time, Adriana also informed Officer Park of A.M.'s existence and that she believed her to be with her Uncle Quintero in Sunnyside. McLaughlin RP 05/18/2016 at 30. Paula then left and went to Trios where she and her family identified the body the paramedics had recovered from Tweedt Street as Luisa Garcia. RP at 618; McLaughlin RP 05/18/2016 at 64.

Following her death, Luisa was examined by forensic pathologist Dr. Sigmund Menchel. RP at 875, 878. Dr. Menchel saw there was a perforated gunshot wound on the right side of Luisa's torso, with blackening around it from a muzzle imprint from the barrel of the gun. RP at 881, 884. The bullet exited Luisa's body on the back of her torso on the left side after traveling through her body from right to left. RP at 896. Dr. Menchel also found a grazing gunshot wound, where the bullet did not perforate the skin, on Luisa's back. RP at 893-94. At the conclusion of the autopsy, Dr. Menchel determined Luisa's cause of death was a gunshot wound to the chest and abdomen. RP at 902.

At approximately 12:30 a.m. on December 25, 2015, the defendant and A.M. returned to his Uncle Quintero Medina's home in Mabton, and the defendant left A.M. there. McLaughlin RP 05/18/2016 at 75-76. The defendant then returned to Kennewick between five and six in the morning and went to see Angel Villela-Rojas, a friend who lived at 1310 West Fifth Street. RP at 838-40. When Angel opened the door, the defendant "came in saying that he killed his girl." RP at 840. The defendant told Angel that he had driven Luisa's car and that he (the defendant) needed to move it, which he did. RP at 840-41. The defendant told Angel that while he was driving to Union Gap or Granger, he had tossed the gun and a cellphone, though he did not indicate to Angel where he had done so. RP at 842.

Detective Riley of the Kennewick Police Department located Luisa's car at 505 South Olympia Street in an apartment complex parking lot near Angel's home on December 25, 2015. RP at 758-60. Forensic scientist, Elizabeth Schroeder, from the Washington State Patrol Crime Scene Response team collected a .9mm cartridge case found on the front passenger seat of the vehicle, and one found in the rear passenger side of the vehicle on the floor boards. RP at 914-15, 919-20, 926, 929, 931, 934. Luisa's purse and identification were found in the trunk of the vehicle, and two Samsung Galaxy cellphones were found in the center console. RP at 933, 938-39. Ms. Schroeder collected a bullet from inside the driver's seat and recovered a second from inside the driver's side door. RP at 939, 945-46, 949, 952-53. Ms. Schroeder testified that both bullets had a general trajectory from the passenger's side to the driver's side and downward. RP at 976-77.

On December 31, 2015, the Kennewick Police Department posted on Facebook photographs of officers along Interstate 82 conducting a search for evidence related to Luisa's homicide investigation. RP at 638-39. Ricardo Orea saw the post and contacted the police because shortly after Christmas Eve, he and his friend, Shelby Barrett, had found a gun about 10-15 yards from the Interstate, near the Yakitat exit. RP at 661-62, 666, 671, 673, 677-78. Ricardo and Shelby met police at the Yakitat exit

to provide them with the firearm they found and show the officers where the gun had been recovered. RP at 666, 679.

After the firearm was collected, the gun, along with the bullets and cartridges recovered from Luisa's car, were sent to the Washington State Patrol Crime Lab for DNA trace and blood trace evidence testing. RP at 648, 910. Alison Walker, a forensic scientist with the Washington State Patrol Crime Laboratory, examined the gun and bullets recovered for DNA evidence. RP at 1029, 1033-38. She testified that she found no evidence of blood on the gun or on one of the bullets. RP at 1034-37. She did find blood evidence on the other bullet, though it was not enough for a DNA profile. RP at 1037-38.

The evidence was then sent to the Tacoma crime lab for ballistics testing. RP at 648. Forensic scientist Johan Schoeman concluded that the bullets and cartridge cases from the crime scene had been fired from the recovered .9mm Luger pistol. RP at 981, 999, 1010.

During the investigation, it became clear that the defendant had an extensive history of domestic violence against Luisa. RP 05/09/2016 at 55. After an ER 404(b) hearing held on May 9, 2016, the court found that, by a preponderance of the evidence, four instances of prior bad acts had occurred. RP 05/09/2016 at 55. The court ruled the prior bad acts admissible to establish motive, intent, and res gestae. RP 05/09/2016 at 56.

The first bad act occurred while Luisa was pregnant with A.M. RP at 484. Luisa's friend, Soledad Amaya, testified that on this occasion she witnessed the defendant become angry at Luisa and choke her. RP at 480, 484-85. Luisa was unable to get away until Soledad's brother bear-hugged the defendant and threw him to the ground. RP at 485.

The second bad act occurred when Luisa's sister, Yahaira Garcia, witnessed the defendant become angry with Luisa after she wouldn't give him her car keys. McLaughlin RP 05/18/2016 at 42-43, 47-48. Yahaira testified that during this argument, the defendant grabbed Luisa by the neck and pushed her into the wall, all while Luisa was holding A.M. McLaughlin RP 05/18/2016 at 48.

Soledad also testified to the third bad act: On October 28, 2015, the defendant became violent toward her and Luisa in front of A.M. RP at 491. Soledad testified that the defendant refused to get out of Luisa's car and told Luisa he was going to take her to Finley and kill her. RP at 492. When Soledad tried to help, the defendant told her to "shut the fuck up before he shot [her], too." RP at 493. The girls then grabbed A.M. and ran inside where they sat with the door locked for over an hour. RP at 495. During this incident, the defendant had a "cocked" handgun in his hand. RP at 493-94.

The defendant again became violent with Luisa in front of A.M. just a few days later on Halloween while Soledad, Yahaira, and Luisa were hanging out making dinner. RP at 496-98. The defendant became angry with Luisa after she received a phone call from another man. RP at 497-98. He broke Luisa's phone while yelling at her, "who is calling you?" RP at 497-98; McLaughlin RP 05/18/2016 at 56. Luisa gave A.M. to Soledad and ran into her room. RP at 498. The defendant ran after her and threw her into a closet. RP at 498. Yahaira testified that during this incident, the defendant was squatting next to Luisa and kept pushing her down when she tried to get up. McLaughlin RP 05/18/2016 at 57-58. A.M. was present and witnessed this incident. RP at 498-99. Shortly thereafter, the defendant went to North Dakota and did not return until December of 2015. RP at 499-01.

An Information and Motion for Arrest and Detention was filed with the court on December 30, 2015, charging the defendant with Murder in the Second Degree with a firearm enhancement and multiple aggravating circumstances allegations. CP 3-5.

The defendant filed a Motion to Suppress on April 15, 2016, regarding his statements made post-Miranda because he is a foreign national and was not read his consular rights. CP 31-51. The State filed a response on April 22, 2016. CP 59-60. The defendant filed an amended

Motion on April 26, 2016, to which the State responded to on April 28, 2016. CP 62-91. In a written order, the court found that although the officers clearly violated Article 36(I)(b) of the Vienna Convention[3] when they did not read the defendant his consular rights, suppression of statements given voluntarily after a valid waiver of his Miranda rights was not a valid remedy. CP 115. The court also found that because the Miranda rights were not read at the *commencement* of recording the defendant's statements, the recording violated the privacy act. CP 116. Thus, the court suppressed the recording; however, it did not suppress the defendant's statements. CP 116-17. Even given this ruling, the State did not introduce the defendant's post-Miranda statements to police during the trial.

The defendant stood trial from May 18, 2016, to May 24, 2016. RP at 430-1173. The jury returned a general verdict of Guilty of Second Degree Murder. CP 1309; RP at 1174-75. It also returned a special verdict of "yes" that: (1) the defendant was armed with a firearm at the time of the commission of the crime; (2) Francisco Javier Munoz Quintero and Luisa Alejandra Garcia were members of the same family or household; (3) the crime was an aggravated domestic violence offense; and (4) the crime

[3] Vienna Convention on the Law of Treaties, *opened for signature* May 23, 1969, 1155 U.N.T.S. 331.

involved a destructive or foreseeable impact on persons other than the victim. CP 1310-13; RP at 1174-75.

The defendant was sentenced on June 20, 2016, to an exceptional sentence of 390 months confinement, 36 months community custody, and $12,438.48 in restitution. CP 1332, 1334-35; RP 06/20/2016 at 80-81. The court also ordered the defendant to undergo a domestic violence evaluation and, after argument from both parties, entered a lifetime no-contact order between the defendant and his daughter, A.M. CP 1352-53; RP 06/20/2016 at 80-84. While the court entered the no-contact order, it specifically addressed the timing and indicated any party at any time could bring a motion before the court to modify the order:

> I certainly would be interested in - - in addressing a motion in the future relative to [A.M.] provided - - certainly, anyone can bring that back before me, but - - and to look at what information would show that that would be in her best interest, and so that door is not closed.

RP 06/20/2016 at 84. A.M. is currently in the custody of Luisa's family. RP 06/20/2016 at 82.

The defendant filed a notice of appeal at sentencing. CP 1347; RP 06/20/2016 at 85. The court entered Findings of Fact and Conclusions of Law on Exceptional Sentence on November 28, 2016. CP 1350-51. This appeal follows.

III. ARGUMENT

A. The sentencing court did not erroneously enter a lifetime no-contact order between the defendant, Francisco J. Munoz Quintero, and his daughter, A.M.

Under the Sentencing Reform Act of 1981, a trial court may impose "crime-related prohibitions" that directly relate to the circumstances of the crime and are "reasonably crime related." *State v. Warren*, 165 Wn.2d 17, 32, 195 P.3d 940 (2008); RCW 9.94A.505(9); RCW 9.94A.030(10). "A no contact order is a crime-related prohibition." *State v. Howard*, 182 Wn. App. 91, 101, 328 P.3d 969 (2014). This Court should review the imposition of a crime-related prohibition for abuse of discretion. *State v. Riley*, 121 Wn.2d 22, 37, 846 P.2d 1365 (1993); *In re Pers. Restraint of Rainey*, 168 Wn.2d 367, 374, 229 P.3d 686 (2010).

While parents have a "fundamental liberty interest . . . in the care, custody, and management" of their children, *Santosky v. Kramer*, 455 U.S. 745, 753, 102 S. Ct. 1388, 71 L. Ed. 2d 599 (1982), that right is not absolute, *Prince v. Massachusetts*, 321 U.S. 158, 166, 64 S. Ct. 438, 88 L. Ed. 645 (1944). "Sentencing courts can restrict fundamental parenting rights by conditioning a criminal sentence if the condition is reasonably necessary to further the State's compelling interest in preventing harm and protecting children." *State v. Corbett*, 158 Wn. App. 576, 598, 242 P.3d 52 (2010); *see also State v. Berg*, 147 Wn. App. 923, 198 P.3d 529 (2008),

reconsideration denied. Further, the State has "an obligation to intervene and protect a child when a parent's 'actions or decisions seriously conflict with the physical or mental health of [a] child.'" *State v. Ancira*, 107 Wn. App. 650, 654, 27 P.3d 1246 (2001) (quoting *In re Welfare of Sumey*, 94 Wn.2d 757, 762, 621 P.2d 108 (1980)).

1. The State has a compelling interest in protecting A.M. from a father whose actions seriously conflict with A.M.'s physical and mental well-being.

While the defendant argues that the only compelling State interest here is to protect A.M. from witnessing domestic violence against her mother, the State also has a compelling interest in protecting A.M. from a violent father who has repeatedly shown a complete disregard for A.M.'s physical and mental well-being and who also killed her mother. While the defendant argues that there was no record that the defendant's actions adversely affected his daughter's mental or physical well-being, Br. of Appellant at 10, there are multiple instances in the record to the contrary.

First, the prior bad acts the defendant perpetrated against Luisa also show a clear disregard for A.M.'s mental and physical well-being. Before A.M. was even born, the defendant made clear he held no regard for A.M.'s health or safety when he choked Luisa while she was pregnant with A.M. Further, after A.M. was born he showed little regard for her

safety when he grabbed Luisa by the neck and pushed her into the wall while she was holding A.M. This action not only represented a disregard for how seeing her father abuse her mother would affect A.M.'s mental well-being, but also a complete disregard for her physical well-being. The defendant had no qualms about perpetrating violence against the person holding his daughter. The fact that A.M. was not injured during this incident is entirely because Luisa was an exceptional mother and protector to A.M.

Second, the defendant showed a clear disregard for A.M.'s physical and mental well-being through his continued dangerous use of firearms. On one occasion, while A.M. was in close proximity to the defendant, he had a "cocked" firearm in his hand and used that firearm to threaten Luisa and her friend, Soledad. Further, the defendant showed no regard for A.M.'s well-being when he fired a gun twice in the confined space of a vehicle in extremely close proximity to A.M. He not only held no regard for how A.M. would react to witnessing her father shoot her mother, but he completely disregarded A.M.'s physical safety when he discharged the firearm twice only a few away feet from her.

The defendant argues that the record is unclear whether A.M. was awake or asleep at the time the defendant killed Luisa. However, that does not change the fact that the defendant fired a gun in close proximity to his

baby. During his post-Miranda statements, the defendant stated that he and Luisa had struggled for the gun before it had gone off. However, this indicates even clearer that the defendant has no regard for A.M.'s physical well-being: had the struggle gone differently, A.M. could have been the one shot and killed on that Christmas Eve.

Finally, during sentencing, the State read into the record a letter written by Luisa's mother, Maria, which makes clear the toll the defendant's actions have taken on A.M. RP 06/20/2016 at 69.

> [A.M.], Luisa's daughter, has been affected a lot. He took away her right to have a mom, and Luisa is missing the best of her daughter. [A.M.] is the best of Luisa and misses her and asks for her a lot. She asks me where her mommy is and I tell her, 'Your mommy will be back soon. She went to the store.' [A.M.] will look to the window to see if she's coming. When she sees that Luisa is not coming, she wiggles her little hands and says, 'Mommy no,' that her mommy is not coming.
>
> . . .
>
> At night, while [A.M.] is praying, she looks up at the ceiling and blows a kiss up to the ceiling, to her mom, maybe? I think she knows Luisa is not coming back.

RP 06/20/2016 at 69. Further, the court also made a clear record of the impact the defendant's actions had on A.M. and that she witnessed these events: "[A.M.] will not have her mother. [A.M.] is – has experienced something no child should ever, ever experience in their lifetime to see what she saw that evening." RP 06/20/2016 at 76.

Given the record of prior domestic violence in front of the child, as well as the murder of A.M.'s mother in front of her, the lifetime no-contact order is appropriate to protect A.M. from her violent father who has shown no regard for her well-being. Additionally, the sentencing court clearly indicated that it would revisit the length of the no-contact order at any time. Thus, given the record and the nature and circumstances of this case, the restriction is reasonably necessary in both scope and duration.

2. The case law cited by the defendant is readily distinguishable from the facts and circumstances of this case.

The defendant cites to three cases—*In re Pers. Restraint of Rainey*, *State v. Howard*, and *State v. Aguilar*—to support his argument that the no-contact order violates his fundamental right to parent. However, each of these cases is readily distinguishable.

In *Rainey*, the defendant was convicted of telephone harassment of his wife and first degree kidnapping of his then three-year-old daughter. 168 Wn.2d at 371. The sentencing court ordered the defendant have no contact with his daughter for life. *Id.* On appeal, the court reasoned that the compelling state interest in ordering no contact between the defendant and his minor daughter was to protect the child from "witnessing domestic violence between her parents." *Id.* at 379. Given the facts and circumstances, the court found that "it was not an abuse of discretion for

the sentencing court to conclude that a no-contact order of some duration was appropriate." *Id.* at 380. However, the court reversed due to the lifetime duration of the order. *Id.* at 381-82. The court reasoned that the "restriction's length must also be reasonably necessary." *Id.* at 381. Because the sentencing court did not provide a reason for the lifetime duration of the order, and the State did not attempt to justify the lifetime order as reasonably necessary, the court remanded to the lower court to address the duration under the "reasonably necessary" standard. *Id.* at 381-82.

This case is readily distinguishable because *Rainey* did not provide the opportunity for a later motion to remove the no-contact order, as was done in this case, and by the difference in the facts and circumstances. Additionally, *Rainey* is distinguishable because the State's compelling interest here is not to protect A.M. from witnessing subsequent domestic violence. The State does not dispute that there is no longer a potential that A.M. will witness domestic violence between her mother and father because Luisa is deceased. Rather, as discussed above, the State's compelling interest in this case is to prevent the defendant from perpetrating more violent acts contrary to A.M.'s well-being. The defendant has shown a complete disregard for A.M.'s physical and mental well-being in his past actions, and thus the State is obligated to

protect A.M. from such acts in the future. It is also needed to protect A.M. from unwanted contact from the man who murdered her mother.

This case is also readily distinguishable from *State v. Howard*, 182 Wn. App. 91. In *Howard*, the defendant was convicted of attempted first degree murder and the jury found that the crime was committed "within the sight or sound of the minor children" after the defendant attempted to shoot and kill his wife in the presence of their children. *Id.* at 97-98. The sentencing court imposed a lifetime no-contact order between the defendant and his four biological children. *Id.* at 99. On appeal, the court determined that a no-contact order was reasonably necessary, given that the children witnessed their father attempt to kill their mother. *Id.* at 102. However, because the trial court did not explain why the lifetime duration was reasonably necessary to accomplish the State's goal of protecting Mr. Howard's children, the court reversed and remanded. *Id.* at 102.

First, *Howard* is distinguishable because it was specifically dealing with an attempted murder, not a completed murder, as is the circumstance in this case. Unlike the children in *Howard*, A.M. has been completely deprived of a life with her mother due to the defendant's actions.

Second, while the *Howard* court reasoned that the lifetime no-contact order was unreasonable in duration because the children may wish

to have contact with the parent in the future, the sentencing court here specifically addressed this issue:

> I certainly would be interested in - - in addressing a motion in the future relative to [A.M.] provided - - certainly, anyone can bring that back before me, but - - and to look at what information would show that that would be in her best interest, and so that door is not closed.

RP 06/20/2016 at 84. The court determined that given the circumstances in this case, it was in A.M.'s best interest to sign the lifetime no-contact order. However, because the court left open the possibility of revisiting the duration of the order at a time when allowing contact between the defendant and A.M. would be in her best interest, the sentencing court did not err.

Finally the defendant cites to *State v. Aguilar*, 176 Wn. App. 264, 308 P.3d 778 (2013), *review denied*, 179 Wn.2d 1011, 316 P.3d 494 (2014); however, it too is distinguishable. Mr. Aguilar was convicted of first degree murder of his wife and second degree assault of his thirteen-year-old daughter after he stabbed his wife to death and stabbed his daughter while she was trying to protect her mother. *Id.* at 267-69. The sentencing court ordered a 10-year no-contact order between Mr. Aguilar and his daughter and son, who also witnessed the murder. *Id.* at 269, 271. On appeal, the court reasoned that the "State had a compelling interest in protecting the children from reliving the emotional trauma associated with

their mother's death" and recognized that both children were either direct or indirect victims of the crime. *Id.* at 278. The court also determined that the trial court had adequately addressed the reason for imposing the no-contact order when it (1) "summarized the crucial evidence and pondered the impact the events would have on the children"; (2) "recognized that the children witnessed their father kill their mother"; and (3) recognized that Mr. Aguilar did not "take responsibility for the killing." *Id.* at 277-78. Thus, the court held the condition was reasonably necessary in both scope and duration to protect the emotional well-being of the children. *Id.* at 278.

While the *Aguilar* court reasoned that it upheld the 10-year no-contact order because it allowed Mr. Aguilar to regain contact with his children when they are more mature, the children in that case were much older than A.M. At the end of a 10-year no-contact order, Mr. Aguilar's daughter will be 23 years old, which is old enough to make her own decision about whether she would like to have contact with her father. However, here, had the court imposed a 10-year no-contact order, A.M. would only be 12 years old, not yet at the age of majority, and the State would still have an obligation to protect her from her father. Further, as noted above, the sentencing court specifically provided a provision allowing the court to re-examine the no-contact order should circumstances change such that it would be in A.M.'s best interest to have

contact with the defendant. Thus, given the facts and circumstances of this case, the sentencing court did not abuse its discretion in ordering the lifetime no-contact order.

IV. CONCLUSION

Based on the facts of this case and the reasoning articulated above, the Court should affirm the lifetime no-contact order between the defendant and his daughter, A.M.

RESPECTFULLY SUBMITTED this 2 day of August, 2017.

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CERTIFICATE OF SERVICE

I certify under penalty of perjury under the laws of the State of Washington that on this day I served, in the manner indicated below, a true and correct copy of the foregoing document as follows:

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Signed at Kennewick, Washington on August 3, 2017.

Courtney Alsbury
Appellate Secretary

BENTON COUNTY PROSECUTOR'S OFFICE

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